

REMARKS

In the office action mailed May 18, 2007, claims 1-9 and 15-17 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. patent no. 5,974,238 to Chase in view of U.S. patent 7,213,039 to Ramanujam. Claims 10-12, 14 and 18-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Chase* and *Ramanujam* in view of U.S. pre-grant publication 2002/0029214 by Yianilos.

The May 18, 2007 office action made the claim rejections final. This amendment is therefore submitted under 37 C.F.R. §1.114 with a Request for Continued Examination (RCE) in order to have the foregoing claim amendments entered and considered.

Claim 10 will be cancelled when this amendment is entered. Thereafter, claims 1-9, 11, 12 and 14-20 will remain pending.

Paraphrased, independent claims 1 and 15 have been amended to recite that the network-copy database and the mobile-copy database have different “schemas.” A “schema” is of course well known to be a description of a database to a database management system (DBMS) in the language provided by the DBMS. Among other things, a schema defines aspects of the database, such as attributes (fields) and domains and parameters of the attributes. See e.g., the *Microsoft Computer Dictionary*, Fourth Edition, copyright 1999 by Microsoft Corporation. See also *The Computer Desktop Encyclopedia*, Version 14.3m, copyright 2001, by The Computer Language Co., Inc. See also *Merriam-Wester’s Collegiate Dictionary*, copyright 2003 by Merriam-Webster, Inc., which defines schema as a structured framework or plan.

Support for the different-schema limitation can be found in paragraphs [0029] and [0068], wherein the specification states that the network-copy database has a network schema and the mobile-copy database has a mobile schema. Since the two databases have corresponding schemas that are named differently, it necessarily follows that the two schema are different from each other. No new matter has been added.

The claims have also been amended to recite that synchronization requests sent to a mobile-copy database are “filtered,” such that the network does not ask the mobile device to update data records in the mobile-copy database that are not also determined (by the filtering) to exist in the network-copy database. Stated another way, the filter obviates the need to send a particular updated record of the network-copy database to a mobile device that does not also have, in its mobile-copy database, the same record.

Support for the filtering limitation can be found in original claim 10, which prior to its cancellation by this amendment, stated that the filter “[filters] from a synchronization request...map portions in which a field of the data record of the network-copy database fails to have a corresponding field of the corresponding data record of the mobile-copy database....” Additional support can be found in paragraphs [0029], [0045] and [0055]. Paragraph [0055] in particular states that the “synchronization server includes a filter that filters information contained in the synchronization request” and that the filter “filters” information from a field of a record in the network database for which a corresponding record does also exist in the mobile copy database. No new matter has been added.

The amendments to the independent claims traverse the rejections and place all of the claims in condition for allowance because no reference or combination of references cited by the Examiner shows or suggests the method or apparatus claimed in the amended claims. More particularly, no reference or combination of references shows or suggests selectively filtering database records to determine records that are common to two different databases, which have different schemas, one of which is in a network and the other of which is in a mobile node, and updating the mobile copy of the database over a radio air interface.

Referring now to the prior art that was cited in the last office action, *Chase* discloses a method and apparatus for updating database copies that are held in a host computer and a hand-held computer. As stated in column 3, lines 25-55, however, the method and apparatus of *Chase* provides for the storage of identical copies of data sets that are common to both the host and hand-held computer. *Chase* does not show or suggest how two different databases, with different schema can be synchronized in whole or in part by selectively filtering records

in a network copy that do not also exist in the mobile copy, as the amended claims now require.

Ramanujam discloses a method and apparatus whereby copies of different databases in different formats in different devices can be synchronized, however, the method and apparatus of *Ramanujam* preserves the various different formats of the different databases in the different devices. See for example FIG. 6 and the description thereof, which can be found in column 4, lines 30-55. In *Ramanujam*, one sync engine 20 synchronizes the records 30 in different database copies, e.g., 24 and 24' across any number of devices. Nothing in *Ramanujam* shows or suggests that records in one database with one schema, can be synchronized with a different database with a *different* schema, as the amended claims now require.

With regard to the filtering limitation that has been added to the independent claims, in the last office action, the Examiner erroneously relied on *Yianilos* as teaching the filtering of database records that was claimed by the applicant in original claim 10. A close reading of paragraph [0067] reveals that it teaches a filtering that is exactly opposite to that which is recited in the applicant's amended claims.

Paragraph [0067] of describes how *Yianilos* accomplishes database synchronization. The second to last sentence of paragraph [0067] states that, "[o]nly those records are transferred from one side to the other which (1) are missing on the other side, or (2) have a mismatching record on the other side." (Emphasis added.) In other words, *Yianilos*' method of database record filtering is opposite to the applicant's filtering.

The "filtering" recited in the amended claims prevents the synchronization of network-copy database records, to the mobile-copy database copy, if a record in the network-copy does not also exist in the mobile-copy. In other words, if a particular record in the network copy changes for some reason and that record is not also found in the mobile-copy, even if it has different data, the filtering step recited in the amended claims require that such a record in the network copy not be attempted to be synchronized. Contrary to the filtering recited in the amended claims, the filtering disclosed in *Yianilos*, requires the transmission to

the mobile node, database records found in the network copy but missing from the mobile node copy. The filtering method of *Yianilos* is thus distinctly different, i.e., directly opposite to the filtering recited in the applicant's amended claims.

The Examiner presumably knows that when a claim is rejected under 35 U.S.C. §103(a) on a combination of references, controlling Federal Circuit case law and MPEP §706.02(j) require that each and every pending claim limitation be found somewhere in the cited references. In this case, no reference or combination of references shows or suggests the limitations that are recited in the amended claims. The amendments therefore traverse the rejections and place the amended claims in condition for allowance.

Since the amended independent claims are in condition for allowance, the dependent claims are also in condition for allowance. Reconsideration of the pending claims is therefore respectfully requested.

Respectfully submitted,

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